

FRANKEL ET AL. - 09/503,181
Client/Matter: 061047-0265650

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REMARKS

In this Amendment, claims 1, 16 and 52 are amended merely to recite the subject matter without any intention of narrowing the scope of any of the claims. No new matter has been added. Claims 1-4, 6-54 and 56-67 are pending in this patent application. Reconsideration of the rejection in view of the remarks below is requested.

Claims 1, 16 and 52 have been amended to recite a "business organization" which Applicant submits was the meaning of the term "organization" used previously when viewed in context and use in the specification. Accordingly, Applicant submits that this amendment should not be viewed as narrowing the scope of the claimed invention or to overcome prior art. Applicant submits that the term "business organization" encompasses not only for-profit business organization, but also a non-profit business organization. The term "business" should be understood to include, without limitation, any organization engaged in supplying, offering, etc. any service or product, whether for profit or not.

Rejection under 35 U.S.C. §102(e) in view of Ginter

The Office Action rejected claims 1-15, 64 and 65 under 35 U.S.C. §102(e) as allegedly being unpatentable over U.S. Patent No. 5,892,900 to Ginter et al. ("Ginter"). Applicant respectfully traverses the rejection because the cited portions of Ginter fail to disclose each and all the features recited in combination in the rejected claims.

As noted in Applicant's specification, cryptographic representation of a business organization has typically been defined statically, for a given time. But, such representation has limits especially in business organizations facing structural or dynamic changes. Thus, Applicant's invention of claim 1 relates to control and maintenance of an operational organizational structure to solve, for example, management of dynamic business organizations which often can face significant structural changes. To facilitate this control and maintenance, Applicant's method of claim 1 associates entities within one or more business organizations with cryptographic capabilities and organizes the entities within the organizational structure as roles. The claimed method further maintains (i.e., changes, updates, etc.) the roles within the organizational structure.

Ginter is generally directed to completely different subject matter, namely systems and methods for electronic commerce including secure transaction management and electronic rights protection. Ginter discloses a distributed virtual distribution computer

FRANKEL ET AL. - 09/503,181
Client/Matter: 061047-0265650

environment (VDE) that enforces a secure chain of handling and control to control and/or meter or otherwise monitor use of electronically stored or disseminated information. In short, Ginter is directed to a specific computer system for secure handling of information. Ginter is simply not directed to an organizational structure of one or more business organizations, let alone directed to entities within an organizational structure of one or more business organizations (such as, without limitation, employees of a corporation) and the roles/functions (such as, without limitation, a president of a corporation) of entities within the organizational structure.

So, for example, Applicant submits that the cited portions of Ginter fail to disclose organizing entities within the organizational structure as roles through associating the electronic representations of entities with electronic representations of roles, entities which have associated cryptographic capabilities, as recited in claim 1. The references to "role" in the cited portions of Ginter are simply not applicable to the claim language. For example, none of the cited portions of Ginter references an organizational structure of one or more business organizations or, even if it did, organizing entities within that organizational structure by associating the electronic representations of entities with electronic representations of roles. Rather, the cited portions of Ginter merely indicate that participants in the computer system of Ginter may adopt different roles. The cited portions of Ginter simply do not provide any disclosure of an organizational structure of one or more business organizations, let alone (1) organizing the participants in Ginter within such an organizational structure, (2) that the participants in Ginter have associated cryptographic capabilities, and (3) organizing the participants in Ginter as roles by associating corresponding electronic representations as recited in claim 1.

Additionally, the cited portions of Ginter fail to disclose upon any addition, deletion or modification of an entity, a cryptographic capability, or any of their associations, maintaining roles within the organizational structure by adding, deleting or modifying electronic representations of the entities, cryptographic capabilities, roles, or any of their associations as recited in claim 1.

The cited portions of Ginter merely disclose being able to "add, delete, and/or otherwise modify the specification of load modules and methods, as well as add, delete or otherwise modify related information." Similarly, the cited portions of Ginter merely disclose "[h]andlers in a pathway of handling of content control information ... can establish, modify, and/or contribute to, permission, auditing, payment, and reporting control information related

FRANKEL ET AL. — 09/503,181
Client/Matter: 061047-0265650

to controlling, analyzing, paying for, and/or reporting usage of, electronic content and/or appliances (for example, as related to usage of VDE controlled property content)."

However, none of the cited portions of Ginter discuss maintaining roles within an organizational structure of one or more business organizations by adding, deleting or modifying electronic representations of the entities (within that organizational structure), cryptographic capabilities, roles, or any of their associations, let alone to do so upon any addition, deletion or modification of an entity, a cryptographic capability, or any of their associations. There is simply no reference in those cited portions of Ginter to entities of an organizational structure, cryptographic capabilities of entities, roles of entities, or any of their associations as recited in and in the context of claim 1. The cited portions of Ginter merely refer to adding, deleting or modifying completely dissimilar and unrelated items to the claimed items, such as software load modules, content control information, etc. Those are simply not entities within an organizational structure of one or more business organizations, such as, without limitation, employees in a corporation.

Therefore, Applicant respectfully submits that the cited portions of Ginter fail to at least disclose each and every feature of claim 1. Claim 5 was previously cancelled and so its rejection is moot. Claims 2-4, 6-15, 64 and 65 depend from claim 1 and are therefore patentable subject matter at least for the reasons set forth above with respect to claim 1, and for the features they recite individually. Accordingly, for at least the above reasons, the rejection of claims 1-15, 64 and 65 under 35 U.S.C. §102 in view of Ginter is traversed and claims 1-4, 6-15, 64 and 65 are believed to be allowable.

Rejection under 35 U.S.C. §103(a)

The Office Action rejected claims 16-63 and 66-67 under 35 U.S.C. §103(a) as being obvious over Lampson et al., "Authentication in Distributed Systems: Theory and Practice", ACM Transactions on Computer Systems, Vol. 10, No. 4, Nov. 1992, pgs. 265-310 ("Lampson") in view of Ginter. Applicant respectfully traverses the rejection because the cited portions of Lampson, Ginter, or any proper combination thereof, fail to disclose or render obvious all the features recited in combination in the rejected claims.

Claim 16

Without acknowledging that the cited portions of Lampson disclose or render obvious the remainder of claim 16 (which Applicant submits the cited portions of Lampson do not),

FRANKEL ET AL. -- 09/503,181
Client/Matter: 061047-0265650

Applicant submits, and the Office Action admits, that the cited portions of Lampson at least fail to disclose or render obvious code to change the maintained electronic representations of said entities said characteristics and said relationships upon an addition, deletion, or modification of a characteristic or relationship of the entities as recited in claim 16.

Assuming *arguendo* that Ginter and Lampson are properly combinable (which Applicant does not agree they are since, for example, they pertain to significantly different fields of endeavor – Ginter relates to an electronic commerce transaction system and Lampson relates to authentication in a distributed system - to which a person skilled in the art having regard to Applicant's field would not be commended), Applicant respectfully submits that the cited portions of Ginter fail to overcome the admitted deficiencies of Lampson. As discussed above with respect to claim 1, the cited portions of Ginter merely disclose being able to "add, delete, and/or otherwise modify the specification of load modules and methods, as well as add, delete or otherwise modify related information" such as control parameter data, information or structures. Similarly, the cited portions of Ginter merely disclose "[h]andlers in a pathway of handling of content control information ... can establish, modify, and/or contribute to, permission, auditing, payment, and reporting control information related to controlling, analyzing, paying for, and/or reporting usage of, electronic content and/or appliances (for example, as related to usage of VDE controlled property content)."

However, none of the cited portions of Ginter discuss change of maintained electronic representations of entities within a business organization, or of characteristics (such as an entity's size, threshold for a quorum, or visibility (*see, e.g.*, page 21 of the specification)) of entities within a business organization, or of relationships of entities within a business organization, let alone to do so upon any addition, deletion or modification of a characteristic or relationship of entities within a business organization. Indeed, there is simply no reference in the cited portions of Ginter to entities of a business organization, characteristics of entities within a business organization, or relationships of entities within a business organization as recited in and in the context of claim 16. The cited portions of Ginter merely refer to adding, deleting or modifying completely dissimilar and unrelated items to the claimed items, such as software load modules, control parameter data, information or structures, etc. Those are simply not entities within a business organization or their characteristics and relationships. Accordingly, the cited portions of Ginter simply would not provide any relevant teaching or suggestion to modify Lampson in any way to arrive at the claimed invention as they have little to nothing in common.

FRANKEL ET AL. -- 09/503,181
Client/Matter: 061047-0265650

Claims 17-51, 66 and 67 depend from claim 16 and are therefore patentable subject matter at least for the reasons set forth above with respect to claim 16, and for the features they individually recite.

Claim 52

Without acknowledging that the cited portions of Lampson disclose or render obvious the remainder of claim 52 (which Applicant submits the cited portions of Lampson do not), Applicant submits, and the Office Action admits, that the cited portions of Lampson at least fail to disclose or render obvious a maintenance system embodied in a tangible medium by which said database and said cryptographic authorities are maintained in coordination and by authorized parties assuring the representation of said organization and said cryptographic capabilities are soundly associated as defined by coordination directives; and maintenance transactions acting within said maintenance system, maintaining a view representing said organization as recited in claim 52.

Assuming *arguendo* that Ginter and Lampson are properly combinable (which Applicant does not agree they are since, for example, they pertain to significantly different fields of endeavor -- Ginter relates to an electronic commerce transaction system and Lampson relates to authentication in a distributed system - to which a person skilled in the art having regard to Applicant's field would not be commended), Applicant respectfully submits that the cited portions of Ginter fail to overcome the admitted deficiencies of Lampson.

For example, Applicant submits that the cited portions of Ginter do not disclose or teach a maintenance system by which the database, representing entities of a business organization and their characteristics, roles and relationships, and the cryptographic capabilities are maintained in coordination and by authorized parties assuring the representation of the organization and such that the cryptographic capabilities are soundly associated as recited in claim 52. As discussed above, the cited portions of Ginter merely refer to adding, deleting or modifying completely dissimilar and unrelated items to the claimed items, such as software load modules, control parameter data, information or structures, etc. Those are simply not entities within a business organization or their characteristics, roles or relationships.

Thus, none of the cited portions of Ginter would disclose or teach the claimed database, let alone a maintenance system to maintain coordination between the database and cryptographic capabilities (which is not even referenced in the cited portions). Indeed, there

FRANKEL ET AL. - 09/503,181
Client/Matter: 061047-0265650

is simply no reference in the cited portions of Ginter to entities of a business organization, characteristics of entities within a business organization, or relationships of entities within a business organization as recited in and in the context of claim 52. Accordingly, the cited portions of Ginter simply would not provide any relevant teaching or suggestion to modify Lampson in any way to arrive at the claimed invention as they have little to nothing in common.

Further, the cited portions of Ginter do not disclose or teach maintenance transactions acting within said maintenance system, maintaining a view representing said organization as recited in claim 52. For example, the cited portions of Ginter do not disclose maintaining any sort of view representing a business organization. As noted, the cited portions of Ginter merely disclose a specific computer system for secure handling of information. Ginter is simply not directed to a business organization, let alone directed to entities within a business organization and the roles of entities within the business organization. Applicant submits that there is just no indication that the system of Ginter to modify software load modules, control parameter data, information or structures, etc. maintains a view representing a business organization.

Claims 53, 54 and 56-63 depend from claim 52 and are therefore patentable subject matter at least for the reasons set forth above with respect to claim 52, and for the features they individually recite.

Thus, for at least the above reasons, the cited portions of Ginter and Lampson fail to disclose or render obvious each and all the features of claims 16-63, 66 and 67 and are thus allowable.

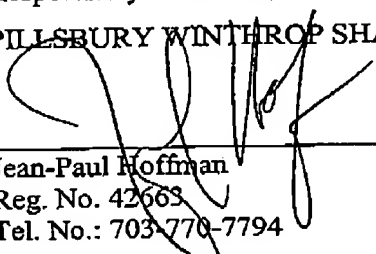
All rejections having been addressed, it is respectfully submitted that the present application is in condition for allowance. If questions relating to patentability remain, the examiner is invited to contact the undersigned to discuss them.

FRANKEL ET AL. -- 09/503,181
Client/Matter: 061047-0265650

Should any fees be due, please charge them to our deposit account no. 03-3975, under our Order No. 061047/0265650. The Commissioner for Patents is also authorized to credit any over payments to the above-referenced deposit account.

Respectfully submitted,

PILLSBURY WINTHROP SHAW PITTMAN LLP



Jean-Paul Hoffman

Reg. No. 42663

Tel. No.: 703-770-7794

JGH
P.O. Box 10500
McLean, VA 22102
Fax No. 703-770-7901